



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 19, 2025

BY ECF

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. LabQ Clinical Diagnostics, LLC, et al.*
No. 22 Civ. 751 (LJL), No. 22 Civ. 10313 (LJL)

Dear Judge Liman:

This Office represents the United States of America (the “Government”) in the above-referenced False Claims Act case. We write respectfully in response to the request by Defendants to adjourn the conference scheduled for Tuesday, June 24, 2025, regarding the Government’s motion for an order to show cause why Defendants should not be held in civil contempt for violating the Stipulation and Order entered by the Court on August 2, 2024 (22 Civ. 10313, Dkt. No. 60) (the “August 2024 Order”), and the Defendants’ request to modify the August 2024 Order. As described below, the Government consents to an adjournment of up to 14 days (to July 8, 2025). Alternatively, the Government would also consent to attorney Jeff Michels appearing telephonically or by videoconference, thereby allowing the conference to proceed as scheduled on June 24, 2025.

In light of the conflict between Israel and Iran that prevents Mr. Michels from attending the conference in person, the Government would consent to an adjournment of the conference of up to 14 days (to July 8, 2025), or to a date that is convenient for the Court, in the hope that Mr. Michels may be able to attend in person. Defendants requested a 10-day adjournment, but a 10-day adjournment would land on the Fourth of July holiday.¹ Due to the uncertainty regarding the duration of time that Israel’s air space may be closed because of the ongoing conflict and the need to move this case forward, the Government respectfully submits that instead of delaying this conference beyond two weeks, the parties should make accommodations that would allow Mr. Michels to appear remotely either by videoconference or telephone if he remains unable to travel to the United States.

¹ While Defendants request a potentially indefinite extension if travel from Israel is not possible in ten days, and the Government informed counsel that it would consent to an adjournment given Mr. Michels’ inability to attend the conference on Tuesday, Defendants did not at that time specify how much time they intended to seek or suggest that the conference should be delayed indefinitely.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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Southern District of New York

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cc: Counsel of Record (by ECF)